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June 11, 2024

The Honorable Dale E. Ho
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: United States v. Jose Garcia, et al.
24 CR 23 (DEH)

Dear Judge Ho:

By this letter motion I respectfully move for a modification of bail extending the geographical limits of Mr. Garcia's travel restriction. Assistant U. S. Attorney Timothy Capozzi and Pretrial Services Officer Meherun Meyer consent to the motion.

Mr. Garcia and his wife, Michelle Cox, are involved in extensive out-of-state travel in connection with their children's extracurricular activities. Pretrial has informed us that is has no objection to the modification of the travel restriction (currently, Southern and Eastern Districts of NY) to "continental United States." Advance requests for travel would be processed administratively by Pretrial, including notice and approval.

Accordingly, I ask the Court to approve the modification of Mr. Garcia's bail.

Application **GRANTED**. The travel restriction in Mr. Garcia's terms of release shall be modified to permit travel throughout the continental United States for the purpose of attending his family's extracurricular activities. The Clerk of Court is respectfully requested to close ECF No. 75.

Respectfully submitted,



David Wikstrom

SO ORDERED.



Dale E. Ho
United States District Judge
New York, New York
Dated: June 11, 2024